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Submitted electronically

Ms. Jennifer Caira
City of Los Angeles
Department of City Planning, City Hall
200 N. Spring Street, Room 621
Los Angeles, CA 90012
Email: jennifer.caira@lacity.org

Re: 601 S. Main SB Omega project, ENV-2014-2907-MND

Dear Ms. Caira,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Mitigated Negative Declaration (MND) for the proposed 601 S. Main SB Omega project, located at 6th and Main Streets in Downtown Los Angeles.

Given the presence and historic significance of its two districts listed in the National Register of Historic Places, as well as the culmination of other large high-rise towers that are either proposed, in-progress, or recently completed, we believe that Downtown is experiencing a critical moment in its development. The proposed project, centrally located within Downtown's Historic Core, represents an important opportunity to examine the role of new infill construction in the historic urban setting.

I. Acceleration of new, high-rise development in Downtown Los Angeles

Unprecedented in its scope, the current boom in construction is bringing greater vitality and much-needed reinvestment to downtown neighborhoods, an objective the Conservancy and many others have worked toward for years. This wave of development is something we strongly support, and we believe there is an important role for new construction in helping to revitalize and reinforce the unique historic character of Downtown as a whole.

The balance and compatibility of old and new is a core component of the original *Historic Downtown Los Angeles Design Guidelines*, produced for the Conservancy in 2002. This document became the basis for the City's *Broadway*



Design Guide and shares many similarities with the *Downtown Design Guide*, both adopted in 2009.

The Conservancy does not often comment or weigh in on new construction projects unless there is a clear and direct impact on a particular historic building or area. In the last year, we have submitted comments on several projects in Downtown, including the Broadway @4th project and the proposed Spring Street Hotel project (631-635 S. Spring Street). Most recently, we commented on The Alexan project at 9th and Hill Streets and the Beacon on Hill project at 4th and Hill Streets. Like the proposed 601 S. Main SB Omega project, each of these projects involves new construction of high-rise towers within Downtown’s Historic Core.

II. Proposed new construction within and immediately adjacent to Downtown’s Historic Core should be compatible and adhere to the *Downtown Design Guide*

Compatibility within an historic context is a somewhat subjective concept, as it should allow for dynamic new ideas and modern design concepts without being overly constricting or mimicking earlier architectural styles.

The *Downtown Design Guide* states that new construction should “respect historically significant districts and buildings, including massing and scale, and neighborhood context.” The Downtown Los Angeles Neighborhood Council’s Principles and Guidelines advise that “new designs should take cues from the existing neighborhood character as well as address existing building typologies, densities, and intensities of use.” In addition, the National Park Service offers some guidance in context with the use and application of the *Secretary of the Interior’s Standards* in a district or neighborhood setting. It states “introducing a new building or landscape feature that is out of scale or otherwise inappropriate to the setting’s historic character” is not recommended.

The proposed 601 S. Main project reveals unique challenges due to its context, location, and site at 6th and Main Streets. It is adjacent to the National Register-listed Spring Street Financial District and is surrounded by individually-designated historic landmarks, including the Los Angeles Stock Exchange Building (618 S. Spring Street), on which the Conservancy holds an exterior conservation easement. Though the project site is a surface parking lot and does not contain any eligible historic resources, it is centrally located within the Historic Core. As such, the design for the new construction should address the site’s surrounding neighborhood context and aesthetics by adhering to guidelines intended to respect and reinforce the existing character of the Historic Core.

As currently proposed, the project calls for the construction of a 38-story tower approximately 390 feet in height, which represents a stark departure from the rest of the immediate surroundings. While we are not opposed to new construction and increased density, this project introduces a much different feel, rhythm, and scale than currently exists in the Historic Core.

Though the MND does not include any renderings or drawings to illustrate the proposed project in context, conceptual renderings found online reveal that the narrowed podium will rise above an eight-



story base, which covers the majority of the lot. While the podium setbacks will enhance the pedestrian experience and relieve some of the pressure on the adjacent properties, we have outstanding questions about the overall scale and design. The MND includes discussion of potentially significant impacts on historic resources from construction vibration and proposes several mitigation measures to address those concerns, but it does not elaborate on the compatibility of the proposed new construction within its historic setting.

In addition to the height of the tower, we are concerned about the introduction of projecting balconies on the primary facades of the new development. We have previously raised this issue with other proposed projects in Downtown, including The Alexan and Beacon on Hill. We believe this design element greatly deviates from the character and overall compatibility of the Historic Core. While you can find balconies on secondary and rear facades throughout Downtown, including recent adaptive reuse projects, they are usually not prominently featured or located on primary facades.

Projecting balconies introduce an entirely new rhythm and feel and are a primary design element of the 601 S. Main project and other hi-rise towers currently being proposed. While the *Downtown Design Guide* does not currently provide enough guidance in this area, it does state “heavy, solid balconies” should be avoided. Overall, we think this design element is more in keeping with the South Park neighborhood or a Miami setting rather than the Historic Core area of Los Angeles.

III. Cumulative impacts of proposed new high-rise construction in Downtown should be analyzed

Looking ahead, from a larger perspective and beyond just this proposed project, we have a number of outstanding concerns, and we question the cumulative impacts of these types of high-rise projects on the historic parts of Downtown. In addition to the potential visual and shade/shadow impacts, high-rise towers of this scale greatly exceed the height of surrounding properties and introduce a new set of proportions to the neighborhood and the National Register-listed districts. In general, the Conservancy is a strong supporter of increased density and believes there is a clear role for this in Downtown. While new high-rise construction suits the context of other parts of Downtown, we do not believe that projects of this scale, however, are ultimately compatible with the existing character of Downtown’s Historic Core environment.

In our previous comments on these types of projects, we have strongly urged the City to conduct a full analysis of cumulative impacts as part of any environmental analysis, examining the potential long-term effects of new construction at this scale on the integrity of National Register-listed districts, namely the Spring Street Financial District and the Broadway Theatre and Commercial District.

Given that nearly a dozen high-rise projects are currently either under construction, approved or proposed, we believe the overall impacts should be understood before it is too late. We strongly believe the City, as the lead agency, has the responsibility to fully assess the cumulative impacts, for this proposed



project and others. The number of these types of projects and the increasing concerns about them only underscore the need for greater understanding of potential impacts and guidance.

The Conservancy believes there is an immediate need to revisit the City's *Downtown Design Guide*. This is currently inadequate at providing guidance and helping to direct growth and development in ways that maintain the existing Downtown neighborhood character. We would press that the update be prioritized and included within the Downtown Community Plan process.

IV. Conclusion

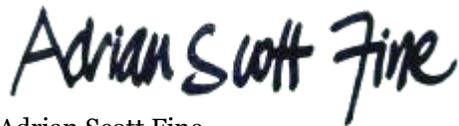
Thank you again for the opportunity to provide comments on this project and others in Downtown's Historic Core. As we all experience the welcome transformation and revitalization of Downtown, we are increasingly faced with new challenges that we may not have originally anticipated. It's important to address these issues before we reach a tipping point, so that we can find an appropriate balance that ensures cultural and historic resources are preserved while still allowing for new development.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,500 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions and if we can be of assistance.

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: Councilmember Jose Huizar
City of Los Angeles, Department of City Planning, Office of Historic Resources

